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<b>AN BORD PLEANÁLA</b>	
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10/09/2020

## Construction of the Boyne Greenway Drogheda to Mornington, Co. Meath & Co. Louth (APB-307652-20)

To Whom it may concern,

### 1. Overview

- 1.1. The following submissions / observations / concerns are raised in regard to Meath County Council's (MCC) Section 177 AE application (Ref: ABP-307652-20) to An Board Pleanála (ABP) for the Boyne Greenway - Drogheda to Mornington as part of the National and Greater Dublin Area (GDA) Cycle Network.
- 1.2. It is noted, ABP allows for the local authority to use its local knowledge of the area when deciding what information should be submitted. However, I would strongly contest that MCC and its consultant(s) have failed to provide sufficient submission information for a fully informed decision/determination to be made by ABP.
- 1.3. A footpath/cycleway, carefully considered and appropriately designed, could provide benefits for residents of Drogheda Southern Environs / East Meath and visitors alike. However, it is felt that the application documentation as submitted:
  - a) Lacks necessary detail to inform a decision;
  - b) Does not fully consider the impacts of the development;
  - c) Presents, in part, an unsafe design, both for motorised and non-motorised users;
  - d) Lacks detailed drawings; and
  - e) Does not fully justify the development in regard to policy and local community needs (both present and future);
- 1.4. The following sections are structured under two of the three points ABP must have regard and informed by ABP's Section 177 AE guidance document. Each section sets out submissions, observations and concerns in regard to MCC's Boyne Greenway (Drogheda to Mornington) application. I will leave concerns about the likely significant adverse effects by the proposed Greenway on the protected European sites to other people.

## 2. Point 1 – Likely Effects on the Environment by the Proposed Development

2.1. This section details various observations in regard to the likely effects on the environment of the proposed development. Observations are made on various reports and their content (or lack thereof) submitted by MCC.

### 2.2. Outline Construction Methodology Report

2.2.1. ABP guidelines note a “*construction methodology statement describing the full extent of all aspects of the proposed development*” should be provided. Only an Outline Construction Methodology report has been submitted.

2.2.2. An Outline Construction Methodology report by its very nature cannot fully considered all aspects of the proposed development (as they relate to construction). The Outline document does not meet the minimum submission requirements of a Section 177 AE application. The following paragraphs note, although not limited to, a number of areas of the Outline document which do not fully considered the development impact.

2.2.3. The document does not adequately detail the intended site compound(s) to be used during construction. The use of existing municipal compound is noted in the document text however, the exact location(s) is not provided. In addition, individual site areas along the route (e.g. bridge crossings, junction alterations etc.) are not detailed. Consequently, it is not possible to independently assess the suitability of the potential compound(s) or site locations for construction activity.

2.2.4. Given the proposed development is approx. 5.9km in length, materials and people will have to be moved between the compound and individual sites. No impact assessment of these movements on the local road network has been provided. No assessment of possible vehicle types to be utilised during construction, construction traffic routes, expected number of construction vehicle trips, any mitigation measures to manage traffic flow at individual sites etc is provided.

2.2.5. No detail is provided on where construction workers / contractors are expected to park during construction. The municipal compound(s) may provide some parking spaces (although this cannot be independently verified on the information provided) however, other parking areas will likely be required considering the construction site is effectively 5.9km in length. The Outline document does not detail a parking strategy with appropriate parking measures to manage demand during construction – whether this is MCC aspiration for the future appointed construction company(s) or MCC employees if it is to be constructed by MCC.

2.2.6. Limited information is presented on the construction methodology of the two proposed bridges, construction sites in themselves. The existing Mornington Bridge (at chainage 3715) and approaches are constrained in the land available and potential access points. A construction site / compound here would have to accommodate piling machinery (and associated materials), bridge spans, excavated material etc and / or involve a significant number of deliveries to / from site.

2.2.7. The Outline document notes the two proposed bridges are to span “20 metre” gaps but provides no information on how these bridge spans will be delivered, stored and installed on site. A standard articulated vehicle is limited to between 16.5 – 18.75 meters in length (excluding abnormal types). Consideration of the methodology for delivery of the bridge spans is not detailed. Nor are mitigation measures detailed to limit the impact of construction activity on all road users (motorised and non-motorised).

2.2.8. A commitment to monitoring is detailed in the Outline document. This commitment does not go far enough, nor does it provide for any means of input from the actual users of the development, i.e. the public. The development is part of the wider National / GDA Cycle Network which will take several years to construct and become operational. The proposed monitoring period post construction of 3 years is an insufficient amount of time to properly monitor the cumulative impacts of usage, especially if the development integrates with the wider cycle network route and usage increases.

2.2.9. The proposal passes directly in front of a school, namely, [REDACTED] [REDACTED] “in front of 2 schools, namely, [REDACTED] and [REDACTED]” The Outline document does not specifically detail, as it relates to the school(s), the construction methodology to be implemented in the vicinity of the school. This section which includes a crossing point will necessitate works to be carried out adjacent to and on the existing road alignment. Limited detail on how construction activity would be undertaken here and if any mitigation measures would be put in place to limit the impacts and protect vulnerable road users such as school children.

### Summary

2.2.10. The Outline document fails to provide a full and proper consideration of the development proposal construction methodology. A full, detailed and properly considered Construction Methodology report should be provided to ABP by MCC as part of the current application process. Construction can have a detrimental impact on the environment and if ABP were minded to request a full Construction Methodology report as a possible planning condition it would risk improper consideration after the fact.

## 2.3. Impact of Greenway Related Traffic and Capacity Assessment on Road Network

2.3.1. The development as submitted is a single section road (as defined in para 7.1.4 of the Constraints & Preliminary Report), approximately 5.9km in length, and part of a potentially wider cycle network with a regional and national context. The Constraints & Preliminary Design report section 6.3 provides a very high-level assessment of the road network. It considers traffic volume (and accident history, see Section 2.4 below) from the point of overall capacity yet it does not provide any assessment of vehicle movements directly related to the greenway. Not all users of the proposed Greenway will travel to the greenway by walking, cycling or public transport.

2.3.2. Nor has a quantitative assessment of the number of greenway users and their potential impact on the road network been presented. MCC proposes a 4m wide greenway, which Transport Infrastructure Ireland’s (TII) Rural Cycleway Design (Offline) document notes the

desirable minimum width of two-way, low volume cycle facilities with shared use with pedestrians is 3 metres. Low volume facilities are those considered to attract less than 1,500 users per day. The desirable minimum width for high volume facilities (attracting greater than 1,500 users per day) is 5 metres. A cumulative impact assessment of all these users from the wider regional and national cycle network is not presented.

- 2.3.3. A number of users will also drive to the various entry /exit points along the route to access the greenway. As detailed later in Section 3.4, there is poor connectivity between the proposed route and allocated / future growth land parcels in Drogheda Southern Environs / East Meath which will encourage users to drive to the greenway.
- 2.3.4. No proper consideration for where users might park along the route is presented. For example, a family of 4 (2 adults, 2 children) with bikes will need a safe and convenient place to unload their equipment from their car. Given parking requirements aren't fully assessed, it would be assumed users are expected to park on the road. It is noted, the majority of the road adjacent the route has no parking restrictions however, as the volume of users on the route increases indiscriminate potentially unsafe parking is likely.
- 2.3.5. The start point (Chainage 0) at Drogheda is adjacent to [REDACTED] Marsh Road car park. While it is helpful to have this facility, this is a car park for users of the rail network and ultimately [REDACTED] has control over its use. With the planned [REDACTED] extension to Drogheda now moving forward and its expected increased rail users, [REDACTED] may have to consider reserving this car park just for rail users and not greenway users – forcing greenway users to park elsewhere, impacting residential amenity.
- 2.3.6. The end point (Chainage 5870) at Mornington SAC/Beach, does not provide dedicated car parking, again assuming greenway users will park along the road / on the dunes / SAC. Tower Road is a quiet residential road which allows on road parking. Yet, if users decided to park along the road, the intention of the shared space is diminished as parked cars reduce space, create blockages and could during busy times become chaotic and unsafe as emergency vehicles could not pass. In addition, the beach/dunes area is a SAC area and parking within the area should not be permitted.
- 2.3.7. Minimal parking for cyclists is provided along the route. Some spaces are provided adjacent the scheme at Mornington Beach/SPA. These spaces appear to accommodate a standard cycle however, the route is likely to be used by a variety of people including those with larger / wider cycle equipment and mobility aids (e.g. adapted bikes for less able people, cargo bikes, child trailer attachments etc.).
- 2.3.8. A Route Option Assessment Main Report is also included in the submitted documentation. This document notes in paragraphs 3.2.12 & 3.2.13, a high-level assessment of traffic impact has been undertaken focusing on the impact expected to be incurred by motorists using private vehicles as a result of the route options. This is an inadequate assessment in my view, and I would observe the following points:
- a) The GDA Cycle Network Plan document does not assess the impact of the proposed section of greenway, therefore MCC's Route Option document (or an equivalent submission document) should provide ABP with a full assessment.
  - b) No assessment of vehicle movements directly related to the greenway is presented.

- c) No quantitative assessment of the number of greenway users is presented. High volumes of users (i.e. at least 1,500 per day) would likely impact the free flow of traffic.
- d) Various options in Section 2 of the route note Mornington Road (R151) is unsuitable for shared /mixed street facilities based on observed traffic volume and speeds. The speeds quoted, 85th percentiles from ATC 2 are likely higher than the actual 85th speeds on this section. The location of ATC 2, over 800m to the west of the R151/North Lane junction, is on a road alignment allowing unhindered progression and in a less built up area, these factors are likely to encourage drivers to increase their speed. Whereas the section of Mornington Road R151 in the vicinity of The North Lane / Tower Road junction has a substantially larger number of private accesses directly onto the carriageway is comparatively a more built up area, has bus stop provision etc., factors which would likely reduce vehicle speeds below those observed at ATC 2.
- e) Also, the AADT is noted to range from 4,500 to 5,000 vehicles along Mornington Road. This volume of traffic is not completely incompatible with shared / mixed cycle provision, as indicated in the National Transport Authorities (NTA) Cycle Manual (section 1.7.4).
- f) The Route Option document does not fully consider the introduction of hard traffic calming measures (e.g. road narrowing, one-way priority control short section(s) etc.) which could reduce speed and provide more road space for shared facilities. This would arguably provide more benefits for local residents than the proposed raised table measures.
- g) Allocated and future development in East Meath / Drogheda Environs is not directly served by the proposed route. The Route Options document does not present any assessment of potential routes / alterations of the proposed route to serve growth areas at Donacarney or to the west of the Mill Road. Granted, this would deviate the route away from the Boyne Estuary, but it would limit the impact on the SPA and SAC (European Protected sites), provide better connectivity and support the sustainable development of the area.

## 2.4. Appropriate Design and Safety of All Users

2.4.1. The proposed route, based on the submitted documentation, lacks full consideration of all safety aspects of a greenway, its impact on the existing road network and potential users.

2.4.2. The submitted documentation notes a Stage 1 Road Safety Audit was undertaken of the proposed design and recommendations incorporated. The Road Safety Audit report is not provided as part of the submitted documentation. For full transparency, this document should be included / provided to ABP to inform their decision.

2.4.3. I wish to make the following observations on the road alignment drawings submitted, where it is felt safety has not been full considered:

- a) Sheet 7 – The waste water treatment works can require access to the site by articulated vehicles. A raised table is provided at the access junction however, no bollards are proposed to ensure larger vehicles do not encroach on the greenway as they turn into / out of the access.
- b) Sheet 18 Mill Road / R150 junction – The existing poor visibility from the Mill Road to vehicles traveling eastbound on the R150 does not appear to be improved. ABP should request a drawing that shows the required visibility splays (x and y distance) in both directions that can be achieved at this junction. The lack of a raised table on the R150



- carriageway allows through vehicles to maintain speed, whereas continuing the raised table would introduce a physical measure to slow speeds and improve the situation. The collision statistics show a cluster of accidents here including one serious in severity accident in 2012. The design needs to do more to improve conditions at the junction.
- c) Sheet 18 cont. – The controlled (signals) aspect of the proposed crossing point is not guaranteed as part of the scheme. Even if signals are provided, if drivers see they are green they are unlikely to slow on approach to the junction, again this does not improve the existing situation. Furthermore, the drawing shows an existing footway leading south along the Mill Road away from the junction. This footway does not exist – this misrepresents the level of protection and southern accessibility for pedestrians.
  - d) Sheet 26 Church Road / R151 Junction – Two zebra crossings are proposed at this junction. Given the lack of footway width between the zebra crossings and mixed ability of expected users of the greenway, separate crossing facilities for cyclists should be provided, to avoid pedestrians / cyclists stepping out into the carriageway and moving traffic.
  - e) Sheet 26 cont. – The zebra crossing on the R151 carriageway is placed beyond the bend as a vehicle approaches from the east. Forward visibility on approach to this junction is poor and the road alignment presents as a sweeping continuation, inconsistent with an environment that may lower vehicle speeds. Paragraph 6.3.6 of the Constraints & Preliminary Design Report notes yellow bar markings have had to be provided to slow approach speeds. ABP should request a drawing which shows a driver on approach can see, to the required SSD, the whole width of the proposed crossing (including to the back of the tactile paving on each side). The approaching driver may be able to see the far side section (i.e. closest to the Estuary) of the crossing but if they cannot see the near side section in a sufficient distance, the design puts a non-motorised user at an unnecessary risk of injury.
  - f) Sheet 30 to 32 – No crossing facility is provided for residents on the southern side of the road to access the greenway.
  - g) Sheet 35 to 37 Mornington Road section – This 500m stretch has numerous (approx. 21) private accesses which directly front onto the proposed greenway. The design provides a 4m wide hard surfaced route along this section and would encourage a cyclist to assume that an uninterrupted free flowing progression at speed (circa 30kph) was possible. This design fails to adequately and safely provide for all users (motorised and non-motorised) and increases the risk of conflict at each private access. Greenway users would be able to walk /cycle directly alongside each property boundary, increasing the risk of conflict as a driver crosses the greenway onto the main R151 carriageway. The design does not provide a safety margin /verge or obstacles to limit this potential conflict. NTA Cycle Manual suggested designs for frequent entrances provides some form of separation (generally a footway) between the private access and the cycle infrastructure. This approach should be investigated for the 500m section detailed.
  - h) Sheet 35 [REDACTED] Access – The design does not provide any extra consideration of the access to the [REDACTED] This is a commercial premise which also includes a flower shop, café and hair salon and would generate more vehicle movements than a residential dwelling yet it is treated the same.
  - i) Sheet 38 Tower Road Junction – The design does not provide a designated crossing point for pedestrians / cyclists coming from the south of the junction to cross the road and access the greenway. The greenway merges with the carriageway at the junction bellmouth. No details of road signage warning drivers of this merge are presented.
  - j) Sheet 39 & 40 Tower Road – As noted previously, a full assessment of the expected volume of users of the greenway has not been presented. There is the potential for the concept of

the shared space to be diminished and become unsafe if excessive and uncontrolled parking occurs along Tower Road.

2.4.4. The Domestic Entrance Drawing Greenway Adjacent illustrates 2m x 15m sightlines onto the greenway. A sightline of this dimension is prescribed by TII's Rural Cycleway Design report for a design speed of 10kph. As previously noted the design of the greenway along the 500m section to the west of Tower Road is likely to encourage /allow for cyclist speeds higher than 10kph. The design has not given proper regard to this possibility and as it currently stands is unsafe.

2.4.5. The Route Option report notes in paragraph 3.2.14 that the number of junctions along each route option has been used as a proxy (among other considerations) for road safety. This does not specify if this includes private accesses, such as the 20 + access points along the 500m section west of Tower Road, or if it is just limited to main junctions. If it is just main junctions than this proxy inadequately considers the safety of greenway users. The report authors should provide clarity on this and further assess the safety requirements.

### 3. Point 2 - Likely Consequences for Proper Planning and Sustainable Development

3.1. It is considered that the Boyne Greenway (Drogheda to Mornington) in its current proposed format (route, impact assessment, safety provisions, impact on European Sites) does not fully consider its consequences under relevant national, regional and local policy documentation and provides inadequate justification and mitigation measures to meet a sufficient threshold to warrant approval from ABP. The following paragraphs set out my observations / concerns under the second point which ABP must have regard to.

#### 3.2. Future Sustainable Growth & Maximum Connectivity Policy Justification

3.2.1. National policy focuses on creating sustainable, climate positive strategies which can also help to stimulate economic growth. The concept of a Greenway (or Blueway & Peatway) is promoted in the Project Ireland 2040: National Planning Framework as a facility to *"offer a unique means for tourists and visitors to access and enjoy rural Ireland"*. Indeed, Policy Objective 22 notes Greenways should facilitate tourism development, achieving maximum impact and connectivity at national and regional level. The National Policy Framework also notes that strategies should *"carefully manage the sustainable growth of compact cities, towns and villages"*.

3.2.2. The proposed route does not provide a satisfactorily unique experience for tourists / visitors, nor does it achieve maximum impact and connectivity with the future growth planned for Drogheda Southern Environs and East Meath.

3.2.3. The greenway route as submitted may facilitate some tourism development in the locality however, it is considered that it would not achieve maximum impact or connectivity.

3.2.4. The Meath County Development Plan (current plan (2013-2019) and draft plan (2020-2026)) allocate future growth (i.e. zoning) in regard to Drogheda Southern Environs / East Meath, at the following locations:

- a) Drogheda Southern Environs – broadly speaking this covers parcels of land west from the Mill Road towards the Dublin-Belfast railway and further west towards the M1.
- b) Donacarney – broadly speaking this covers parcels of land around the Garra Road / R150 junction, north towards the church and south towards the primary school.
- c) Bettystown Environs - it is accepted, given the proposed route ends at Mornington beach/SPA that growth in Bettystown is likely outside a reasonable consideration of the route.

3.2.5. The Boyne Greenway route, as submitted, does not maximise its connectivity with these allocated / planned future growth areas. Granted the route as planned would pass to the north of the Drogheda Southern Environs section however, existing north south connections through this growth area are inadequate or still at an indicative corridor stage. The Mill Road is the only north south connection and it lacks pedestrian and cycling infrastructure and has an undulating gradient unsuitable to less experienced cyclists.

3.2.6. The greenway route may provide a connection for the [REDACTED] complex however, it is unrealistic to expect [REDACTED] or any other school further south along the Mill Road would risk the safety of its pupils by making pupils walk/cycle the Mill Road to link with the Greenway. Indeed, the Mill Road does not provide a suitable link for residents of future development parcels to walk/cycle to access the greenway.

3.2.7. Similarly, the greenway route will pass to the north of the allocated / planned future growth around Donacarney. North south pedestrian / cycle connections here (i.e. the R150) are slowly improving as more residential development is built but there are still sections which are inadequate or lacking any physical infrastructure. Donacarney Primary Schools are over a 1.5km from the route and it would be unrealistic to expect pupils to access the greenway by walking/cycling due to the insufficient infrastructure provision. These two schools are the largest schools in the immediate hinterland, with circa 1,000 pupils on the same campus.

3.2.8. The planned route east from Mornington Bridge to its end point at Mornington beach/SPA does not pass any allocated / future growth areas. Rather the route would serve rural areas which may be better served by a non-greenway link such as, a combination of a standard footpath (approx. 2m) and traffic calming measures to slow speeds along the R151 and encourage on-street cycling. Considering the above points, the proposed route does not maximise connections with allocated and planned future growth areas, does not promote the sustainable development of the area, and does not adequately address policy objectives.

### 3.3. Proposed Section of Boyne Greenway within Wider National / GDA Cycle Network Plan Context

3.3.1. The submission material presents the proposed Greenway as a 4m wide recreational route which may also support commuter / non-recreational journeys between Drogheda and Mornington. The documents go on to note the Drogheda to Mornington section is part of the wider GDA Cycle Network, the East Coast Trail, the Boyne Greenway and National Cycle Route



5. Relevant to these various route designations are a number of policy documents which consider national cycle routes and design parameters. These documents include the GDA Cycle Network Plan, Rural Cycleway Design (TII) and the National Cycle Manual 2011 (NTA). Section 2 has already presented my observations / concerns that various safety design details, as per these documents, are not properly considered by the application submission. Thereby, failing to provide ABP with a proper planning consideration against point 2.

3.3.2. Furthermore, I would be concerned that, based on the submitted documents, that an assessment of the full cumulative impact of the greenway has not been presented to ABP. That is, the submission material, does not assess the capacity of the greenway to accommodate the potential number (and types) of users and related impact on the local area / road network and protected European sites.

3.3.3. The Constrains & Preliminary Design Report and Route Options Assessment Report presents a very high-level review of the road network and basic traffic flows along the route however, no assessment of directly related greenway traffic (motorised and non-motorised) is presented nor is a long term cumulation assessment of directly related greenway traffic presented. From a point of proper planning, the lack of a full assessment fails to provide adequate information for ABP to make an informed decision.

## 4. Summary

4.1. The observations and concerns raised in the preceding sections are intended to help inform ABP in its responsibility to consider this application in regard to two of the three points. A footpath/cycleway, carefully considered, fully assessed and appropriately designed, could provide benefits for residents of Drogheda Southern Environs / East Meath and visitors alike. However, as detailed in each section, the submitted documentation does not provide sufficient detail for an informed decision to be taken by ABP.

Yours sincerely,

Signed:

